

THE LAW OFFICE OF PATRICK TRAINOR, ESQ., LLC

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February 3, 2025

Via: [CM/ECF](#)

The Honorable Jessica S Allen, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, New Jersey 07101

Re: *D'Ambly v. Exoo, et al.*,  
Civil Case No.: 2:20-cv-12880-JMV-JSA  
Joint Request for Brief Adjournment to Finalize Settlement

Dear Judge Allen,

As you may recall this office represents Plaintiff Daniel D'Ambly (hereinafter "Plaintiff" or "D'Ambly") in the above-referenced action against the Tribune Publishing, LLC ("Tribune") and the New York Daily News Company ("Daily News") (herein collectively "Daily News"). The parties have reached an agreement to settle the matter and are finalizing the settlement agreement.

I spoke to Mr. Mulherin, counsel for the Daily News, who consents to this joint request for a brief stay on the case so that the parties may finalize the settlement agreement.

If Your Honor needs additional information, I am available at (201) 777-3327.

Sincerely,



Patrick Trainor  
*Attorney for Plaintiff*

\*In light of the parties' settlement, the current deadlines as set forth in the Court's 1/27/25 Order, (ECF No. 216), are hereby stayed.

s/Jessica S. Allen  
United States Magistrate Judge

Dated: February 3, 2025